



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

**STATE OF ALABAMA, EX REL,
ROBERT E. WILTERS,**

Plaintiff,

v.

**NOOR H. A. YOUSEF,
ABDALQADER HAMAD YOUSEF,
AND A 2008 DODGE SPRINTER VAN
(VIN NO. WD0PE845X85271951),**

Defendants.

CASE NUMBER: CV2019-_____

COMPLAINT

COMES NOW the State of Alabama, by and through Elizabeth Jones, Assistant District Attorney, and petitions this Honorable Court to forfeit and condemn the above-referenced property, and as reasonable grounds sets forth the following:

1. On October 22, 2019, officers with the Baldwin County Sheriff's Office were advised to be on the lookout for a white Dodge Sprinter van bearing Florida registration known to be bearing a large amount of Mitragyna Speciosa, otherwise known as Kratom.
2. At approximately 3:30pm, Task Force Officer Stephen Bailey observed the vehicle traveling on Interstate 10 near the 43 mile marker in Baldwin County, AL, following too close to a vehicle in the outside lane. Officer Bailey began to follow the van and observed the driver having difficulty maintaining his lane and crossing the center line. Officer Bailey initiated a stop.
3. Officer Bailey made contact with the driver, Noor Yousef. During his conversation with Yousef, Off. Bailey asked Yousef what he was hauling and Yousef advised he was transporting t-shirts, sex pills, and Kratom. Off. Bailey advised Yousef Kratom is illegal in Alabama and he could not cross state lines while in possession. Yousef state he was traveling from Mississippi to Florida.
4. Yousef gave permission to search the vehicle. The search yielded approximately 405 pounds of Kratom in the cargo area, drug paraphernalia including grinders, glass popes, scales, and plastic bags, t-shirts, gas masks, stimulant pills, and other miscellaneous items. Officers also located US currency in a drawer of a cabinet located beside the front seat.
5. Yousef was read his Miranda warning, and stated he obtained the Kratom in Atlanta.
6. Yousef was charged with Drug Trafficking pursuant to Code of Alabama §13A-12-231(12).

7. Officers seized the 2008 Dodge Sprinter Van (VIN NO. WD0PE845X85271951) based upon the information that Defendant was using the vehicle to transport and/or to facilitate the transportation or possession of controlled substances in violation of the laws of the State of Alabama regarding controlled substances.
8. The vehicle is registered to Abdalqader Hamad Yousef, who Noor Yousef identified as his brother. Yousef told officers his business was a family business.
9. It is the position of the State of Alabama that the above listed vehicle was used or intended to be used to facilitate the violation of the laws of the State of Alabama regarding controlled substances. Thus, it is the position of the State of Alabama that the vehicle is subject to condemnation and forfeiture to the State of Alabama pursuant to § 20-2-93 of the 1975 *Code of Alabama*.

WHEREFORE, the above premises considered, the State of Alabama respectfully requests this Honorable Court to take jurisdiction of this cause, allow all interested parties to assert any claims, if any they have, and that upon final hearing of this action, this Honorable Court will enter an order forfeiting the property at issue in this Complaint to the State of Alabama for use for law enforcement purposes.

This the 6th day of November 2019.

Respectfully Submitted,

/s/ C. Elizabeth Jones

C. Elizabeth Jones

Assistant District Attorney

**TO BE SERVED ON DEFENDANT
AT THE ADDRESS BELOW:**

Noor Yousef
6111 Enterprise Dr, Unit 2005
Pensacola, FL 32505

OR

DEFENDANT TO BE SERVED IN JAIL:

Booking No:
MniNo:
Booking Date: